

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

Plaintiff,

v.

JOHN L. HUTCHINS & ROBERTO SOLIMAN

Defendants.

**SUPPLEMENTAL
DECLARATION**

Cri. No. 22-CR-42-JLS-JJM

RODNEY O. PERSONIUS declares the truth of the following under the penalty of perjury:

1. I am a member of Personius Melber LLP, and am acting as retained counsel for defendant Roberto Soliman.

2. A motion for permission to travel was filed on behalf of Mr. Soliman at Doc. No. 59 on September 21, 2023.

3. The proposed travel covers the time period September 22 through September 25, 2023, and consists of visiting northern Virginia and Washington DC for what is described in the application as "pleasure."

4. In the past, Mr. Soliman has on several occasions requested permission to travel to the same vicinity for the same purpose.

5. On each occasion, as is also true in this instance, his supervising Probation Officer has had no opposition to the proposed travel.

6. On each prior occasion, the request was granted.

7. In this instance, the Court has issued a Text Order (Doc. No. 59) which states as follows: "Given the frequency of trips, the proposed solo travel for pleasure, and the lack of plans

to meet with others, the Court needs more information and the purpose of this (and any future) trip." A copy of this Text Order is annexed as **Exhibit A**.

8. Mr. Soliman was born and raised in Egypt, and is steeped in both Mediterranean culture and cuisine.

9. While he has family, including a wife and children, they do not presently reside in the United States.

10. He lives alone in Niagara Falls, NY, and works.

11. For all intents and purposes, he does not have a social life.

12. From time to time, with permission of the Court, he travels alone to northern Virginia and Washington DC for the primary purpose of going to restaurants in that area that offer Mediterranean cuisine and music.

13. Prior to being arrested, he frequented similar Mediterranean restaurants located in Mississauga, Ontario, Canada.

14. Since his arrest, the conditions of his release prevent him from crossing the border.

15. He has identified northern Virginia as having several Mediterranean restaurants similar to the ones he used to visit in Mississauga.

16. Annexed as **Exhibits B** through **Exhibit F** are excerpts from websites for five Mediterranean restaurants located in northern Virginia that the defendant has patronized.

17. In particular, **Exhibit B** is an excerpt from the website for the Martini Lounge located in Falls Church, VA; **Exhibit C** is an excerpt from the website for the Zikrayet Restaurant located in Alexandria, VA; **Exhibit D** is an excerpt from the website

for the Cloud Lounge located in Arlington, VA; **Exhibit E** is an excerpt from the website for the Phoenicia Restaurant & Lounge located in Vienna, VA; and, **Exhibit F** is an excerpt from the website for the Sahara Restaurant Lounge located in Sterling, VA.

18. In each instance, the provided website excerpt reflects that the restaurant's cuisine is Mediterranean in style, and that live music is offered.

19. Neither this cuisine nor type of music is available in western New York.

20. The cultural opportunities and large variety of museums available in Washington DC is the secondary reason he chooses to travel to this area of the country.

21. It is solely for these reasons that, whenever he has the opportunity, Mr. Soliman chooses to travel alone to northern Virginia and the Washington DC area.

22. Upon information and belief, since his arrest, Mr. Soliman has been compliant with all conditions of his pretrial release, including during periods when he has been allowed to travel outside the district.

WHEREFORE, the defense reiterates its request that the Court permit the proposed travel on the part of Mr. Soliman to northern Virginia and Washington DC over the period September 22 through September 25, 2023.

Dated: Buffalo, New York
September 21, 2023

/s/ Rodney O. Personius
Rodney O. Personius
PERSONIUS MELBER LLP
Attorneys for Defendant
ROBERTO SOLIMAN
2100 Main Place Tower
Buffalo, NY 14202

(716) 855-1050
rop@personiusmelber.com

TO: AUSA Paul Bonnano
United States Attorney's Office
Western District of New York
Buffalo, New York 14202

USPO Andre McCray
United States Probation Office
2 Niagara Square
Buffalo, New York 14202

Paul Cambria, Esq.
Justin Ginter, Esq
Lipsitz Green Scime Cambria LLP
42 Delaware Ave. #120
Buffalo, New York 14202

EXHIBIT A

Rodney O. Personius

From: webmaster@nywd.uscourts.gov
Sent: Thursday, September 21, 2023 11:10 AM
To: Courtmail@nywd.uscourts.gov
Subject: Activity in Case 1:22-cr-00042-JLS-JJM USA v. Hutchins, et al. Text Order

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. DISTRICT COURT

U.S. District Court, Western District of New York

Notice of Electronic Filing

The following transaction was entered on 9/21/2023 at 11:10 AM EDT and filed on 9/21/2023

Case Name: USA v. Hutchins, et al.
Case Number: 1:22-cr-00042-JLS-JJM
Filer:
Document Number: 60(No document attached)

Docket Text:

TEXT ORDER as to defendant Roberto Soliman's [59] motion to travel. Given the frequency of trips, the proposed solo travel for pleasure, and lack of plans to meet with others, the Court needs more information and the purpose of this (and any future) trip. Issued by Hon. John L. Sinatra, Jr. on 9/21/2023. (KLH)

1:22-cr-00042-JLS-JJM-2 Notice has been electronically mailed to:

Rodney O. Personius rop@personiusmelber.com, amb@personiusmelber.com, gmd@personiusmelber.com

Paul J. Cambria, Jr pcambria@lglaw.com, kdrewery@lglaw.com

Justin D. Ginter jginter@lglaw.com, aworkman@lglaw.com, kdrewery@lglaw.com, kreumann@lglaw.com

Paul E. Bonanno paul.bonanno@usdoj.gov, samantha.burlew@usdoj.gov

1:22-cr-00042-JLS-JJM-2 Notice has been delivered by other means to:

EXHIBIT B

Fields marked with an * are required

Name *

Phone

Email

Message



SUBMIT



6763 Wilson Blvd, Unit R3,
Falls Church, VA 22044, US
+1 703-712-7314



VISIT US

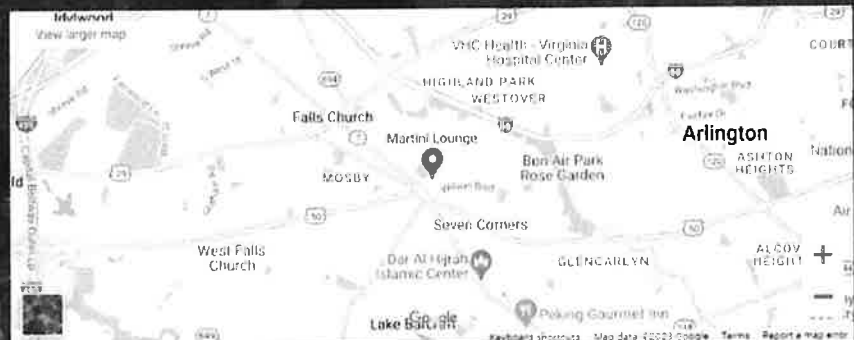
6763 Wilson Blvd, Unit R3 Falls Church, VA 22044
Tel: 703-712-7314

Open from 4pm to 2am

WORK WITH US

Contact the manager on duty for more info.

FOLLOW US



All rights reserved with Martini Lounge

MENU

CUISINE SUSHI BAR DESSERT

CUISINE

Martini Mix Grill – \$48

Lambchop (2 pieces)

1 lamb Kabob Skewer, Chicken Kabob Skewer. 1 Lamb & Beef Kabob Skewer served over rice and grilled vegetables

Lambchop – \$34

4 pieces served over rice with garlic mashed potatoes and grilled vegetables

Lamb & Beef Kabob Skewer – \$26

Ground meat, 2 kabobs served over rice and grilled vegetables

Chicken Kabab Tikka Skewer – \$21

2 marinated chicken breast served over rice and grilled vegetables

Lamb Beef Shawarma (gyro) – \$22

Served over rice or with fries

Appetizers

Hummus – \$7

Baba ganoush – \$7

Labneh – \$8

Spicy Meze – \$7

Tabouli – \$6

Tzatziki yogurt (cacik) – \$6

Grapo Leaves – \$8

Mixed Mezo – \$20

Chicken Quesadilla – \$11

Chicken Wings (hot/mild/barboque)

(10) pieces \$16

(20) pieces: \$26

(30) pieces: \$36

Served with carrots, celery, ranch or blue cheese

Chicken Tenders (with fries) – \$10

Mozzarella Sticks – \$12

Served with marinara sauce

Jalapeno Poppers – \$12

Served with Ranch dressing

Onion Rings – \$8

BEVERAGE

Coke Products – \$3

Bubble tea – \$7

Smoothies – \$7

Hot Tea – \$4

American Coffee – \$8

Green Tea – \$4

Salads

Caesar Salad – \$12

Served with Caesar dressing

Mediterranean Salad – \$14

Mixed greens over bed of lettuce served with House dressing

Shepherd's Salad – \$12 Tomato, cucumbers, onion, and parsley served with House dressing

Baked Glazed Salmon – \$27

Served over rice with sweet plantains

Grilled Half Chicken – \$16

Served with over rice with baby carrots

Shrimp Florentine – \$24

White garlic sauce with spinach topped with parmesan and romaine choose

Baked Lasagna – \$22

Pasta layers of seasoned ground beef ricotta, mozzarella with marinara sauce baked and topped with melted mozzarella

Chicken Fettuccine Alfredo – \$22

Sauteed mushrooms in a creamy Alfredo sauce served over a bed of fettuccine

Pesto Pasta – \$19

Creamy Pesto sauce with sun dried tomato

House Cheese Burger – \$16

8 oz served with lettuce, tomato, grilled onion, grilled mushroom, mayo, and a side of fries

Soups

Lentil Soup – \$7

Soup of the Day – \$8

SEE MENU & ORDER



WHY MARTINI LOUNGE?

Welcome to Martini, the premier nightclub in the heart of the city. With our state-of-the-art sound and lighting, talented DJs, and live singers, we offer an unforgettable nightlife experience. Our extensive drink selection and spacious venue make us the perfect destination for any occasion, from intimate gatherings to large-scale events. Come join us for a night of fun, music, and drinks at Martini!

VISIT US

6763 Wilson Blvd, Unit R3 Falls Church, VA 22044

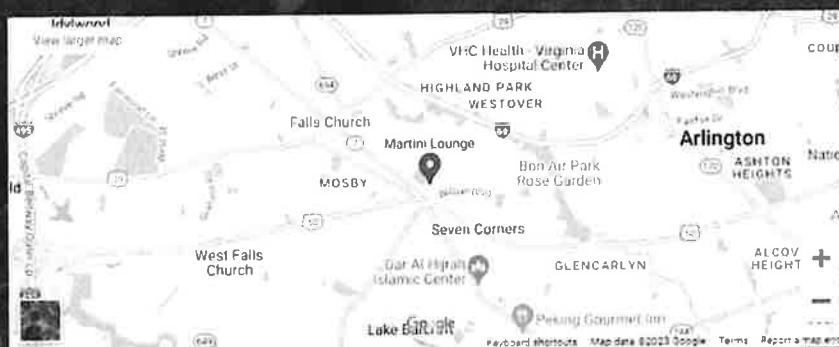
Tel: 703-712-7314

Open from 4pm to 2am

WORK WITH US

Contact the manager on duty for more info.

FOLLOW US



© All rights reserved with Martini Lounge



Automated page speed optimizations for fast site performance

EXHIBIT C



Zikrayet Food Drinks Hookah Live Entertainment Gallery Contact Us About Us

CONTACT US

Send us a message and we'll get back to you as soon as possible.
Looking forward to hearing from you.

OPENING HOURS

Monday	12:00PM - 1:30AM
Tuesday	12:00PM - 1:30AM
Wednesday	12:00PM - 1:30AM
Thursday	12:00PM - 1:30AM
Friday	12:00PM - 1:30AM
Saturday	1:00PM - 1:30AM
Sunday	1:00PM - 1:30AM

Name

Name

PURPOSE OF THE CONTACT

Catering

PHONE

PHONE

Email

Email

COMMENTS

COMMENTS

☐ Check here to receive email updates

SUBMIT

Make a Reservation

2 people

Sep 21, 2023

7:00 PM

Find a Table

OpenTable



VISIT US

2006 Eisenhower Ave, Alexandria, VA 22314

703-838-2008

zikrayet@zikrayet.com

Accepted Payment methods



We proudly offer the full
Lebanese experience.
Lebanese food with a twist of
hookah & live entertainment.

Quick Links

- Food Menu
- Hookah Menu
- Book a Table
- Book Catering
- Order Online

Useful Links

- About Us
- Gallery
- Live Entertainment
- Privacy Policy
- Terms & Conditions

Contact Us

2006 Eisenhower Ave,
Alexandria, VA 22314

703-838-2008

zikrayet@zikrayet.com





GALLERY





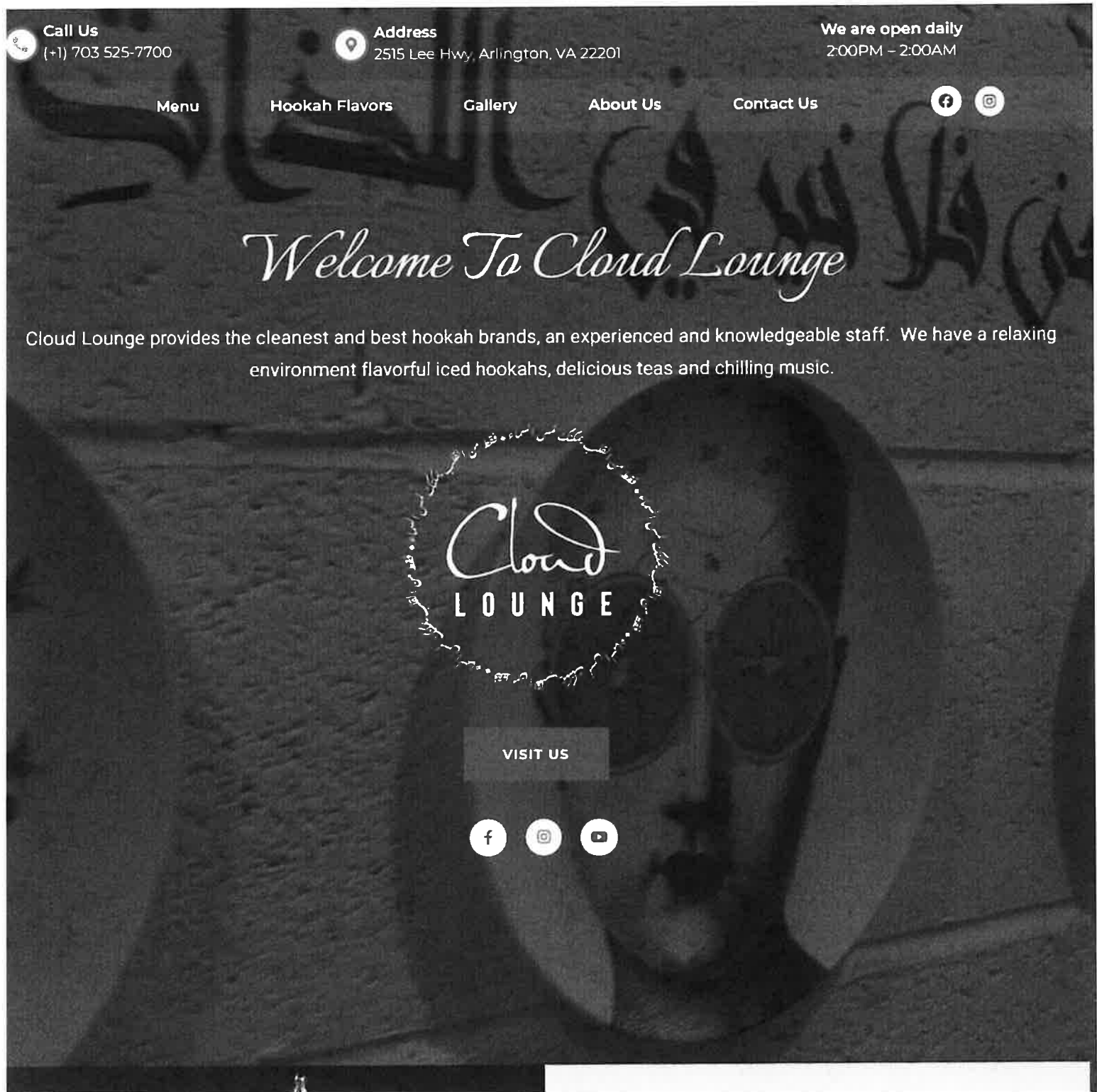
LIVE ENTERTAINMENT

We bring some of the most talented Arabic performers from across the U.S. and the world. With the beat of Arabic drums, a fully stocked bar, and an expansive dance floor, Zikraa transforms into a lively Beirut nightclub every weekend.

Performances begin after 9 p.m. every Friday and Saturday. Call ahead and book your table – they go fast!

RESERVATION

EXHIBIT D





Share

Mezze

Salads

Bites

Kask

Specialty

Hot Drinks

Cold Drinks

Temperance Bar

Desserts



Mixed Nuts 

\$ 12.00



Activated Almonds,
Walnuts & Turmos

\$ 12.00



Crudités

\$ 8.00



Nachos

\$ 12.00



Twln Slders

\$ 13.00



Wings (5)

\$ 15.00

EXHIBIT E

2236 Gallows Rd, Vienna, VA 22182 (703) 204-9555

[CONTACT](#) [HOME](#)**PHOENICIA**
RESTO & LOUNGE[ABOUT](#)[MENU](#) ▾[ORDER ONLINE](#) ▾[CONTACT](#)

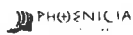
Search...

**PHOENICIA MENUS****CATERING MENU****CATERING****FULL BAR MENU**[ABOUT](#)[MENU](#)[Dine In Menu](#)[Desserts & Beverages](#)[From The Bar](#)[Catering Menu](#)[Hookah](#)[Order Online](#)[Grubhub](#)[Uber Eats](#)[Doordash](#)[Catering / EZ Cater](#)[CONTACT](#)2236 Gallows Rd, Vienna,
VA 22182 [Get Directions](#)**(703) 204-9555**info@phoeniciaresto.com**NAME ***

First

Last

EMAIL ***MESSAGE ***



[ABOUT](#) [MENU](#) [ORDER ONLINE](#) [CONTACT](#)

MEZZA/TAPAS



RAHEB

grilled eggplant / lemon / fresh peppers / walnuts / olive oil

10.0



HUMMUS BILLAHME

hummus / small beef cuts of tenderloin / pine nut

11.0



MOUHAMARA

sun-dried peppers / bread crumbs / walnuts / lemon / olive oil

8.0



ADONIS

feta cheese / tomato / scallion / sumac / olive oil

9.0



HOME-MADE LABNEH

strained yogurt / olive oil / zaatar

8.0



HUMMUS

chickpea puree / lemon / tahini / olive oil

8.5



BABA GHANOUSH

grilled eggplant / lemon / tahini / olive oil

9.0



WARAK ENAB BIL ZEIT

grape leaves / rice / tomato / parsley / lemon / onions / olive oil

10.0



FUSION HUMMUS

chickpea puree / lemon / tahini / red pepper / olive oil

9.0



COLD MEZZA SAMPLER

hummus / baba ghanoush / grape leaves / mouhamara / tabouleh

22.0





A gratuity of 18% will be automatically added to your dine in bill.

REGULAR HEAD

21.0

SPECIAL EVENT HOOKAH

25.0

REFILL

8.0

During Live Entertainment events

GRAPEFRUIT HEAD

25.0

REFILL

10.0

FLAVORS

Phoenicia Special Mix* Must Try! ~ Summer Mix (Grapefruit, Kiwi, Lemon) ~ Amazing Mix (Pineapple, Kiwi, Gum mint) ~ Double Apple ~ Double Apple Mint ~ Watermelon ~ Watermelon ~ Mint ~ Grape ~ Grape Mint ~ Lemon ~ Lemon Mint ~ Orange ~ Orange Mint ~ Grapefruit ~ Grapefruit ~ Mint ~ Blueberry ~ Blueberry Mint ~ X-Berry Mint ~ Gum ~ Gum Mint ~ Gum Cinnamon ~ Blue Mist ~ Blue Mist Mint ~ Safari Melon Due ~ X On The Beach ~ Tropicool ~ Sunny Moon ~ Lemon with Honey ~ Mint ~ Peach ~ Kiwi ~ Strawberry ~ Mango Pineapple ~ Margarita



EXHIBIT F



Welcome to Sahara Restaurant Lounge



Restaurant

Hookah Lounge

Full Bar

Belly Dancing

Your Lebanese Restuarant and Hookah Lounge in Sterling, VA

Hookah Lounge

Are you looking for a hookah lounge in an atmosphere that is warm, inviting, and family friendly? A place where you can relax alone after a long day's work or gather with your friends and family for an instant party?

Lebanese Cuisine

We bring the authentic and time-honored tradition of middle-eastern cuisine to the Loudoun County area in an inviting and affordable setting.

Our recipes have been passed down from generation-to-generation, from our family to yours. Stop in today and enjoy middle-eastern cooking at its finest.



We would like to hear from you !

*Required fields

Name *

Phone *

Email *

Phone Number *

Comment *

SUBMIT

Events

Hookah Lounge :

Looking for some entertainment? Maybe a night out with the guys or girls? Why not make it a Sahara Hookah Lounge night? We've got lots to offer.

- FULL...FULL...FULL...BAR
- Best Lebanese Cuisine
- Best Hookah
- DJ Nights
- Karaoke Night
- Live Entertainment
- Belly Dancing Shows
- Fun, competitive contests with CASH prizes, such as: Best Dressed Lady Night
- Out Door Seating offered

*****Happy Hour, 12pm-6pm, EVERYDAY!!! \$10 Hookahs, \$5 Sandwiches & \$10 Pizzas.
Not valid on the Sahara Special and the Fruit Heads*****

Stop in today or call us at 703-421-8251 for more information.

Our Menus

SAHARA
LEBANESE CUISINE
TRADITIONAL LEBANESE RESTAURANT

All Desserts
N.Y. Cheesecake
Traditional New York Cheesecake served with a dust of powdered sugar and extra berry. \$7.99

Tiramisu
Bespoke cannoli-style by three layers of espresso-soaked sponge cake and dusted with cocoa powder. \$7.99

Chocolate Fondant
Chocolate layer cake filled with a dab of chocolate cream, elegantly & chocolate cream and topped with chocolate glaze. \$7.99

Chocolate Mousse
Rich chocolate mousse and elegant topped with chocolate curls. \$6.99

Coppa Café
Pair of little gelato with a rich coffee and pure vanilla swirl. \$6.99

Baklava
Sweet pastry made of layers of phyllo dough filled with chopped nuts and sweetened with orange blossom syrup. \$7.99

Fruit Rhapsody Borbet
Borbetto served with its natural fruit. \$12.99

Specialty Drinks
Sahara Magic
Vodka, Rum, Gin, Blue Curacao, Lemon QJ and Pineapple Syrup. \$11.99

Oranien Arab
Rum, Peach Schnapps, QJ and Chambard Raspberry Liqueur. \$12.99

Oranien Sandy
Vodka, Rum, Gin, Blue Curacao and Apple. \$11.99

Pomegranate Martini
Gin, Dry Vermouth, and Pomegranate Juice. \$14.99

Mango Mojito
Rum, Club Soda, Sugar Syrup, Fresh Mint, Peach Mango Juice and Lemon. \$12.99

Beverages
Smoothies \$4.99
Juice \$2.99
Espresso \$3.99
Energy Drinks \$4.99
Hot Tea/Coffee \$4.99
Nescafe \$2.99
Soda \$2.99
Bottled Water \$2.99

Lebanese White Wine
KSARA
Glass \$14.99 Bottle \$52.00

WARDY
Glass \$14.99 Bottle \$52.00

BORGIO BOSCHETTO
Glass \$14.99 Bottle \$52.00

ST. THOMAS
Glass \$14.99 Bottle \$52.00

Lebanese Red Wine
KSARA
Glass \$14.99 Bottle \$52.00
Reserve de Cuvée

Lebanese Starters

Veggie Platter

Grape Leaves, Falafel and Tabbouleh \$17.99
Add Chicken or Kofta Kabab \$8.00
Add Gyo \$8.00
Add Beef Kabab \$7.99
Add Lamb Kabab \$7.99



Grilled Halloumi Cheese

Grilled goat cheese with olives & pickles. \$11.99

Falafel

Chicken, chickpeas and fava bean fritters served with tahini sauce and vegetables. \$8.99

Chicken Wings

Alad, Hot or 111 \$18.99

Mozzarella Sticks

Alad, Hot or 111 \$18.99

Hummus

Alad, Hot or 111 \$18.99

Baba Ghanouge

Smoked eggplant, tahini, fresh squeezed lemon, garlic and olive oil. \$8.99

Labneh

Slightly salted yogurt with olive oil. \$8.99

Grape Leaves

Rolls with rice, meat, and spices. \$8.99

Foul Mudammas

Fava beans, chickpeas, fresh squeezed lemon, garlic and olive oil. \$8.99

Fried Calamari

Fried squid served with Marzano Sauce. \$14.99

Fried Shrimp

Fried shrimp with a sauce. \$15.99

Fried Chicken Tenders

with Ranch Dressing \$11.99

Soup & Salad

Soup of the Day

Handmade Chicken or Beef Lentil \$8.99

Seafood Soup

Shrimp, chicken, meatballs in broth, tomato, garlic and olive oil. \$14.99

Chicken Mediterranean Salad

Shrimp of grilled marinated chicken strips over a bed of salad greens with feta cheese and Caesar dressing. \$14.99

Tabbouleh

Parade salad with bulgur, tomatoes, onions, fresh mint, fresh squeezed lemon and olive oil. \$8.99

Yogurt Cucumber

Yogurt, cucumber, garlic and meat \$6.00

Wedge Salad

Grilled Lamb with Tomatoes, Onions, Dates with Ranch Dressing \$10.00



Sandwiches

(All Sandwiches are served with Complementary French Fries & Pickles)

Meat Shawarma Sandwich

Tahini sauce, onions, tomatoes and pickles. \$11.99

Chicken Shawarma

Garlic sauce, onions, tomatoes, and pickles. \$11.99

Kofta Kabab Sandwich

Tahini sauce, onions, tomatoes and pickles. \$11.99

Shish Tawook Sandwich

Garlic sauce, onions, tomatoes, and pickles. \$11.99

Grilled Halloumi Sandwich

Tahini sauce, onions, tomatoes, and pickles. \$11.99

Falafel Sandwich

Lettuce, tomatoes, onions, pickles, bread. \$8.99

Gyro Sandwich

Grilled chicken, sauce, lettuce, tomatoes, onions, and feta cheese. \$11.99

Labneh Sandwich

Tahini sauce, cucumbers, pickles, and olive oil. \$8.99



Entrees / Kababs

Served with sautéed vegetables, basmati rice and homemade baked pita bread.

Mixed Grill

Combination of lamb, chicken and kofta kabab. \$25.99

Lamb Kabab Pomegranate

Grilled marinated tender lamb skewers. \$22.99

Lamb Kabab

Grilled marinated tender lamb skewers. \$22.99

Beef Kabab

Grilled marinated beef tenderloin. \$17.99

Kofta Kabab

Ground beef and lamb with parsley, onions, tomato and 7 spices. \$17.99

Shish Tawook

Grilled marinated chicken skewers. \$17.99

Meet Shawarma

Grilled marinated lamb and beef in 7 spices served with tahini sauce. \$17.99

Chicken Shawarma

Grilled marinated chicken breast in 7 spices served with tahini sauce. \$17.99

Gyro Platter

Beef and lamb skewers with yogurt cucumber sauce, shredded lettuce, tomatoes, onions, pickles and fries. \$17.99

